EX. 11

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OGE Energy Corp. P0 Box 321

Oklahoma City, Oklahoma 73101-0321

405-553-3000 www.oge.com

July 29, 2011

Certified Mail 7010 2780 0000 6167 0548

OG/E

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 2nd Quarter 2011

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is enclosing reports for Muskogee and Sooner Generating Stations. As stated in the consent order, the "reports describe measures implemented to address opacity during the previous quarter and a schedule for implementing any additionally planned measures." Due to the date of the consent order execution, the reports for second quarter 2011 will cover only the month of June 2011.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham Supervisor, Air Quality

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor

Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager

Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

Measures Implemented to Address Opacity during the Second Quarter 2011

During the second quarter of 2011, OG&E began implementation of the first phase of measures to address opacity at the Muskogee and Sooner Generating Stations. By letter dated July 1, 2011, OG&E submitted the total sum of \$300,000 as directed in the Consent Order. OG&E also submitted a request for proposal to Burns & McDonnell of Kansas City, Missouri, to seek engineering support for off-line opacity mitigation as follows:

- 1) A review of current operating practices and physical arrangements of the fly ash removal system as it relates to the fly ash vent fans, and
- 2) A review of current ESP operations.

Burns & McDonnell provided a proposal to OG&E for the first phase of the project. It included an engineering and document review of both referenced items. Burns & McDonnell has also provided a draft report of the first phase which includes recommendations for safe and practical solutions to mitigate off-line opacity.

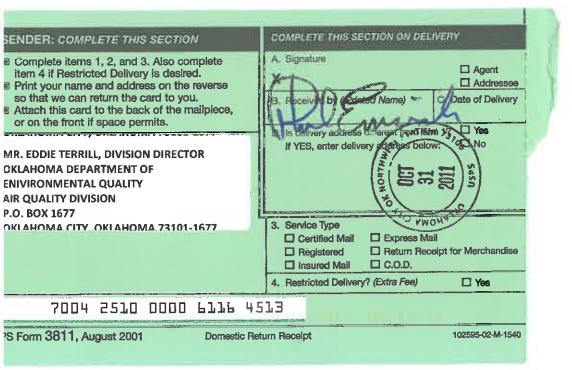
OG&E expects to receive a finalized report from Burns & McDonnell in the 3rd quarter. Once the report is received and reviewed, OG&E will then know additional detail and will proceed with next steps which may include entering into a contract with Burns & McDonnell to implement the solutions.

At this time no additional measures have been discussed beyond those originally discussed with the ODEQ.

The opacity exceedence percentages for Muskogee and Sooner Generating Stations during the second quarter of 2011, as reported in our Part 60 submittal, are as follows:

Unit	Total Duration of Excess	Total Time in the	Excess Emission Duration
Onit	Emissions (hours)	Quarter (hours)	During the Quarter (%)
Sooner Unit 1	67.8	2184	3.10
Sooner Unit 2	47.2	2184	2.16
Muskogee Unit 4	49.1	2184	2.25
Muskogee Unit 5	69.8	2184	3.2
Muskogee Unit 6	50.7	2184	2.32





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OGE Energy Corp. PO Box

Oklahoma City, Oklahoma 73101-0321

405-553-3000 www.oge.com

October 28, 2011

Certified Mail 7004 2510 0000 6116 4513

OGHE

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 3rd Quarter 2011

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is enclosing reports for Muskogee and Sooner Generating Stations. As stated in the consent order, the "reports describe measures implemented to address opacity during the previous quarter and a schedule for implementing any additionally planned measures." The report for the third quarter of 2011 will cover the months July through September 2011.

If you have any questions, you may contact me at (405) 553-3221.

At Boul

Sincerely,

Robert F. Benham Supervisor, Air Quality

Enclosures

cc:

Mr. Robert D. Singletary, Environmental Attorney Supervisor Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

Measures Implemented to Address Opacity during the Third Quarter 2011

I. Muskogee Plant

During the third quarter of 2011, OG&E received a draft report from Burns & McDonnell on July 25, 2011, regarding the ESP offline operation and fly ash removal system at the Muskogee Plant.

A. ESP Offline Operation

At the recommendation of Burns & McDonnell, OG&E agreed for the additional consultation with a third part engineering firm, Southern Environmental Inc. of Pensacola, Florida, to review and make recommendations for ESP operation during offline periods. Burns and McDonnell contacted Southern Environmental on August 8, 2011, and a representative toured the Muskogee Plant on August 31 and September 1, 2011. A draft report provided procedural and mechanical recommendations to facilitate ESP operation during off-line periods. The cost for both projects is estimated at \$8 Million dollars. OG&E is evaluating these recommendations.

Final reports are expected from Burns & McDonnell and Sothern Environmental by the end of 2011.

B. Fly Ash Removal System

On October 17, 2011, Burns & McDonnell submitted a proposed engineering design/specification for Muskogee Units 4, 5 and 6 fly ash removal systems for OG&E's review and approval. OG&E is on track to complete the installation/fabrication/operation of the fly ash removal systems (cross tie system) for the Muskogee units by the end of 2012.

II. Sooner Plant

A representative from Southern Environmental toured the Sooner Plant on October 5 and 6, 2011. A report draft is expected by the end of October 2011.

III. Quarterly Opacity Exceedences

The opacity exceedence percentages for Muskogee and Sooner Generating Stations during the third quarter of 2011, as reported in our Part 60 submittal, are as follows:

	Total Duration of Excess	Total Time in the	Excess Emission Duration
Unit	Emissions (hours)	Quarter (hours)	During the Quarter (%)
Sooner Unit 1	49.9	2208	2.25
Sooner Unit 2	56.7	2208	2.56
Muskogee Unit 4	111.9	2208	5.07
Muskogee Unit 5	0	2208	0
Muskogee Unit 6	21.1	2208	0.96



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OGE Energy Corp.

PO Box 321

Oklahoma City, Oklahoma 73101-0321

405-553-3000 www.oge.com

January 25, 2012

Certified Mail 70011 1570 0000 5895 5631

OG/E

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEO No.: 11-AQN-012

his & Bent

Quarterly Report 4th Quarter 2011

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is enclosing reports for Muskogee and Sooner Generating Stations. As stated in the consent order, the "reports describe measures implemented to address opacity during the previous quarter and a schedule for implementing any additionally planned measures." The report for the fourth quarter of 2011 will cover the months October through December 2011.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham Supervisor, Air Quality

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor

Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager

Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

Measures Implemented to Address Opacity during the Fourth Quarter 2011

During the Fourth quarter of 2011, OG&E received a pre-qualified draft report from Burns & McDonnell. The report included a review of the electrostatic precipitator (ESP) operation at Muskogee and Sooner Plants during startup, shutdown and off-line periods, an evaluation of the ash handling system and a review of personnel and equipment safety. A final report is expected at the first quarter of 2012.

Burns & McDonnell's initial review in part concludes a large percentage of the opacity exceedences experienced at Muskogee and Sooner Plants occur during periods of no combustion and dual fuel (coal and oil or natural gas) combustion.

I. ESP Operation

As discussed in the third quarter update, Burns & McDonnell consulted with Southern Environmental to provide procedural and mechanical recommendations to facilitate ESP operation during startup, shutdown and off-line periods. After additional consultation, questions remained regarding the implementation of ESP operation changes during these periods.

In particular there is concern regarding the bypass of the master fuel trip interlock (MFT) in order to operate the ESP during these conditions. The MFT system, is part of the boiler management system, and among other things is designed to prevent the operation of the ESP during boiler purges, startups, shutdowns and off-line periods. Limiting ESP operation in this manner is in accord with the *National Fire Protection Association 85: Boiler and Combustion Systems Hazardous Code*. To allow for the ESP to operate when the boiler is offline the MFT relay would have to be reset. Resetting the MFT relay could allow fuel to enter the gas path to the ESP (an active ignition source) and potentially cause a fire or explosion. Burns & McDonnell does not recommend operating the ESP with the boiler offline due to the ability of fuel to enter the gas path in the presence of an uncontrolled ignition source. Burns & McDonnell has recommended that OG&E discuss operational modifications with the ESP manufacturers, the insurance provider, plant operations, management and any additional parties that are deemed necessary.

The Burns & McDonnell review has also identified the following safety concerns for the operation of the ESP when the boiler is off-line:

1. Fire and Explosion

Fire and/or explosion in the ESP can be caused by the combining flammable materials (e.g. incomplete combustion of fuels) and sparking. Minimizing flammable materials, such as reducing the amount of ash present, preheating the ESP to prevent oil from depositing on the plates (at Sooner) and minimize condensation/ash build up. Minimizing opportunity for ignition by reducing the sparking levels and removing ESP from service during boiler purges, startups and shutdowns.

2. Ozone Formation

There is a potential for increased ozone formation due to the increase of oxygen gas during ESP off-line operation. Ozone is considered toxic and additional care will need to be taken to ensure personnel are not exposed.

3. ESP Damage and Long Term Availability Operation of the ESP at lower loads and longer periods will increase the wear and tear on internal ESP components. At low load or off-line conditions the potential for sparking

increases. Over time this can potentially damage the ESP and reduce its performance.

4. Electrocution

Operating the ESP off-line will increase the potential risk for electrocution. In particular the key interlock system/clearance permitting system and grounding recommendations will need to be review to include any changes in operation of the ESP. The key interlock system or clearance permitting system is designed to prevent personnel access to the ESP when it is energized. The grounding sticks at access points help to reduce the risk of electrocution.

During periods of no combustion, when the unit is off-line, a larger number of opacity exceedences are thought to be caused by re-entrained fly ash carried through the off-line ESP by induced or natural drafts. OG&E, at the recommendation of Burns & McDonnell, is evaluating the following strategies to help minimize fly ash re-entrainment:

- 1. Empty the fly ash from the ESP hoppers prior to low load operation and shutdown or after unit shutdown at the beginning of an outage (during longer outages).
- 2. Complete a full cycle of boiler soot blowing prior to de-energizing the ESP, aids in cleaning ash from the boiler tubes while helping to sweep fly ash out of the ductwork.
- 3. Allow ESP rapping cycle to continue for an extended period, under appropriate conditions, prior to de-energizing to help minimize the ash layer.
- 4. Prior to shutdown, operate ESP longer than the prescribed boiler purge time to remove fly ash deposits in the inlet ductwork.
- 5. Minimize conveying air in the fly ash silo ventilation system to help reduce opacity when ESP is not in use.
- 6. During an outage of sufficient length vacuum ESP inlet and outlet ductwork to remove fly ash.
- 7. Perform a Computational Fluid Dynamics or Physical Flow Modeling Study to identify fly ash settlement patterns in inlet and outlet ductwork and potential improvements

II. Fly Ash Handling System

During the quarter OG&E approved the Burns & McDonnell engineering design/specification for the fly ash removal system (cross tie system). OG&E is on track to complete this project at Muskogee by the end of 2012.

III. Quarterly Opacity Exceedences

The opacity exceedence percentages for Muskogee and Sooner Generating Stations during the fourth quarter of 2011, as reported in our Part 60 submittal, are as follows:

	Total Duration of Excess	Total Time in the	Excess Emission Duration
Unit	Emissions (hours)	Quarter (hours)	During the Quarter (%)
Sooner Unit 1	19.8	2208	0.90
Sooner Unit 2	79.4	2208	3.60
Muskogee Unit 4	28.8	2208	1.30
Muskogee Unit 5	152.4	2208	6.90
Muskogee Unit 6	48.0	2208	2.17

OGE Energy Corp. PO Box 321

Oklahoma City, Oklahoma 73101-0321

405-553-3000 www.oge.com

April 25, 2012



Certified Mail 7011 1570 0000 5895 5822

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re:

Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 1st Quarter 2012

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is enclosing reports for Muskogee and Sooner Generating Stations. As stated in the consent order, the "reports describe measures implemented to address opacity during the previous quarter and a schedule for implementing any additionally planned measures." The report for the first quarter of 2012 will cover the months January through March 2012.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham Supervisor, Air Quality

Enclosures

cc:

Mr. Robert D. Singletary, Environmental Attorney Supervisor

Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

Measures Implemented to Address Opacity during the First Quarter 2012

During the first quarter of 2012, OG&E worked with Burns & McDonnell to finalize the draft report. The report includes a review of the electrostatic precipitator (ESP) operation at Muskogee and Sooner Plants during startup, shutdown and off-line periods, an evaluation of the ash handling system and a review of personnel and equipment safety. A final report was completed in April 2012. The report was previously summarized in the fourth quarter 2011 update.

I. ESP Operation

It was recommended that OG&E discuss operational modifications with the ESP manufacturers, the insurance provider, plant operations, and management regarding issues previously discussed in the fourth quarter 2011 update. OG&E has reviewed the modifications with the insurance provider, plant operations and management; all agree that the proposed change in ESP operation is outside the original design of the equipment. The general consensus for altering the operation of the ESP has been to carefully develop and implement safe operating procedures for personnel and equipment.

During this quarter, OG&E began the process of implementing procedural and mechanical recommendations to facilitate ESP operation during off-line periods. OG&E has reviewed and changed Muskogee Unit 6 control logic and capability to enable the operation of the ESP during off line periods. OG&E is also developing standard operating procedures for Muskogee's Unit 6 ESP off-line operation, consistent with current NFPA 85 Boiler and Combustion Systems Hazard Code requirements. OG&E is in the process of installing similar control logic and capability for Muskogee Units4 and 5. OG&E expects to start this process on Sooner Units 1 and 2 during the second quarter.

II. Fly Ash Handling System

During the fourth quarter of 2011, OG&E approved the Burns & McDonnell engineering design/specification for the fly ash removal system (cross tie system) at Muskogee and Sooner Generating Stations. OG&E began the process to install the cross tie system for Muskogee's Unit 6 during the first quarter 2012 and is on track to complete the cross tie system for Units 4, 5 and 6 by the end of the third quarter of 2012. OG&E is anticipating the cross tie system for Sooner Units 1 and 2 will be completed the end of second quarter 2012. OG&E is in the process of writing standard operating procedures and expects to place the cross tie systems at both plants into service by the end of third quarter 2012 once installation is completed.

III. Quarterly Opacity Exceedences

The opacity exceedence percentages for Muskogee and Sooner Generating Stations during the first quarter of 2012, as reported in our Part 60 submittal, are as follows:

	Total Duration of Excess	Total Time in the	Excess Emission Duration
Unit	Emissions (hours)	Quarter (hours)	During the Quarter (%)
Sooner Unit 1	0.10	2184	0.00
Sooner Unit 2	50.2	2184	2.30
Muskogee Unit 4	15.2	2184	0.69
Muskogee Unit 5	48.9	2184	2.24
Muskogee Unit 6	27.9	2184	1.27

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OGE Energy Corp. PO Box 321

Oklahoma City, Oklahoma 73101-0321 405-553-3000

www.oge.com



July 23, 2012

Certified Mail 7011 3500 0003 5311 7616

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 2nd Quarter 2012

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is enclosing a report for Muskogee and Sooner Generating Stations. As stated in the consent order, the "reports describe measures implemented to address opacity during the previous quarter and a schedule for implementing any additionally planned measures." The report for the second quarter of 2012 will cover the months April through June 2012.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham Supervisor, Air Quality

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor

Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager

Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

J. Bel

Ms. Patricia Horn, Vice President, Governance and EH&S

Oklahoma Gas and Electric Company

Measures Implemented to Address Opacity during the Second Quarter 2012

During the Second quarter of 2012, OG&E continued to work towards changes to the ESP operation during off-line periods and the fly ash handling systems at Sooner and Muskogee Generating Stations.

I. ESP Operation

During this quarter, OG&E completed the implementation of procedural and mechanical standards for each unit at Muskogee and Sooner to allow for ESP operation during off-line periods. Additionally during the quarter changes to the control logic for Muskogee Units 4 and 5 and Sooner Units 1 and 2 was completed enabling the operation of the ESPs during off line periods. OG&E believes that this portion of District Court Case Number CJ-2011-3361 has been completed with the enabling of the ESP's to operate during offline periods. Future quarterly updates will no longer address this item unless requested by the Department.

II. Fly Ash Handling System

OG&E began the process to install the cross tie system for Muskogee's Unit 6 during the first quarter 2012 and is on track to complete the cross tie system for Units 4, 5 and 6 by the end of the third quarter of 2012. OG&E has completed the installation of the cross tie system for Sooner Units 1 and 2 and expects to complete the standard operating procedures by the end of the third quarter 2012. Once operating procedures are completed the cross tie systems at both plants will be placed into service, approximately the end of third quarter 2012.

III. Ouarterly Opacity Exceedences

The opacity exceedence percentages for Muskogee and Sooner Generating Stations during the second quarter of 2012, as reported in our Part 60 submittal, are as follows:

 Unit	Total Duration of Excess Emissions (hours)	Total Time in the Quarter (hours)	Excess Emission Duration During the Quarter (%)
Sooner Unit 1	44.7	2184	2.04
Sooner Unit 2	38.3	2184	1.75
Muskogee Unit 4	23.0	2184	1.05
Muskogee Unit 5	35.3	2184	1.62
Muskogee Unit 6	14.7	2184	0.67



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OGE Energy Corp. PO Box 321

Oklahoma City, Oklahoma 73101-0321 405-553-3000

www.oge.com

October 29, 2012



Certified Mail 7011 3500 0003 5311 7623

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 3rd Quarter 2012

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is enclosing a report for Muskogee and Sooner Generating Stations. As stated in the consent order, the "reports describe measures implemented to address opacity during the previous quarter and a schedule for implementing any additionally planned measures." The report for the third quarter of 2012 will cover the months July through September 2012.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely.

Robert F. Benham Supervisor, Air Quality

That. Ben-

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor

Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager, Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

Oklahoma Gas and Electric Company

Measures Implemented to Address Opacity during the Third Quarter 2012

During the third quarter of 2012, OG&E continued to work to install the cross-tie fly ash handling systems at Sooner and Muskogee Generating Stations.

I. ESP Operation

OG&E has completed the projects to enable the ESP's, at Sooner and Muskogee Generating Stations, to operate during offline periods. This portion of District Court Case Number CJ-2011-3361 has been satisfied and there are no further updates.

II. Fly Ash Handling System

OG&E began the process to install the cross tie system for Muskogee Units 4, 5 and 6 during the first quarter 2012. The cross-tie systems were not completed at the end of the third quarter as originally planned. The system installation for Units 4 and 5 was completed in October 2012, along with standard operating procedures, and placed in service. The cross-tie system for Unit 6 is expected to be completed by the end of the year. Once the standard operating procedure for Unit 6 is completed the cross-tie system will be placed into service.

OG&E completed the installation of the cross tie system for Sooner Units 1 and 2 during the second quarter and completed the standard operating procedure at the end of the third quarter 2012. The system has been placed into service.

III. Quarterly Opacity Exceedences

The opacity exceedence percentages for Muskogee and Sooner Generating Stations during the third quarter of 2012, as reported in our Part 60 submittal, are as follows:

	Total Duration of Excess	Total Time in the	Excess Emission Duration	
Unit			During the Quarter (%)	
Sooner Unit 1	3.1	2208	0.14	
Sooner Unit 2	14.1	2208	0.64	
Muskogee Unit 4	3.2	2208	0.14	
Muskogee Unit 5	21.0	2208	0.95	
Muskogee Unit 6	19.5	2208	0.88	

6:13-cv-00356-JHP Document 34-13 Filed in ED/OK on 05/21/14 Page 23 of 36 U.S. Postal Service CERTIFIED MAIL. RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) 8101 For delivery information visit our website at www.usps.com. 5311 Postage Certifled Fee Poemark 0003 Merc Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) 500 Total Postage & Fees \$ **RETURN TO** 7011 LAURA HERRON OG&E MC 610 r instruction

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery Is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front If space permits. MR. EDDIE TERRILL, DIVISION DIRECTOR OKLAHOMA DEPARTMENT OF ENIVIRONMENTAL QUALITY AIR QUALITY DIVISION P.O. BOX 1677 OKLAHOMA CITY. OKLAHOMA 73101-1677	A. Signature X
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6:13-cv-00356-JHP Document 34-13 Filed in ED/OK on 05/21/14 Page 24 of 36

OGE Energy Corp. PO Box 321

Oklahoma City, Oklahoma 73101-0321

405-553-3000 www.oge.com

January 22, 2013

Certified Mail 7011 3500 0003 5311 8101

OG/E

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 4th Quarter 2012

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is enclosing a report for Muskogee and Sooner Generating Stations. As stated in the consent order, the "reports describe measures implemented to address opacity during the previous quarter and a schedule for implementing any additionally planned measures." The report for the fourth quarter of 2012 will cover the months October through December 2012.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham

Superintendent Envirochemical Process

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor

Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager

Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney

Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S

Oklahoma Gas and Electric Company

Measures Implemented to Address Opacity during the Fourth Quarter 2012

During the fourth quarter of 2012, OG&E completed the installation of the cross-tie fly ash handling systems at Sooner and Muskogee Generating Stations.

I. ESP Operation

OG&E has completed ESP projects at Sooner and Muskogee Generating Stations during the third quarter of 2012. This portion of District Court Case Number CJ-2011-3361 has been satisfied and there are no further updates.

II. Fly Ash Handling System

OG&E completed the installation of the cross tie system for Muskogee Units 4, 5 and 6 during the fourth quarter of 2012. Standard operating procedures have been written and the systems have been placed in service.

OG&E completed the installation of the cross tie system for Sooner Units 1 and 2 during the second quarter and completed the standard operating procedure at the end of the third quarter 2012. The system has been placed into service.

This portion of District Court Case Number CJ-2011-3361 has been satisfied and there will be no further updates.

III. Annual and Quarterly Opacity Exceedences

The annual and quarterly opacity exceedence percentages for Muskogee and Sooner Generating Stations are recorded in the table below. The annual rolling opacity average is calculated for each station, in accordance with consent order case number CJ-2011-3361, for the period January 1, 2012 through December 31, 2012. Opacity exceedences for the fourth quarter of 2012, as reported in our Part 60 submittal, are for the period October 1st –December 31st, 2012.

	Total Duration of	Total Time in	Excess Emission	Excess Emission
Unit	Excess Emissions	the Quarter	Duration During	Annual Rolling
	(hours)	(hours)	the Quarter (%)	Average/Station (%)*
Sooner Unit 1	26.2	2208	1.19	1 1
Sooner Unit 2	12.6	2208	0.57	1.1
Muskogee Unit 4	14.9	2208	0.67	
Muskogee Unit 5	11.4	2208	0.52	1.1
Muskogee Unit 6	45.7	2208	2.07	

^{*}Opacity Excess Emission Annual Rolling per Station (%) for the period January 1 – December 31, 2012.



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailplece, or on the front if space permits. MR. EDDIE TERRILL, DIVISION DIRECTOR OKLAHOMA DEPARTMENT OF ENIVIRONMENTAL QUALITY AIR QUALITY DIVISION	A. Signature X
P.O. BOX 1677 OKLAHOMA CITY, OKLAHOMA 73101-1677	3. Service Type Certified Mall Registered Return Receipt for Merchandise Restricted Delivery? (Extra Fee) Yes
7011 3500 0003 5311 836	Brand Hill Hill Hill Hill Line
PS Form 3811, February 2004 Domestic Re	turn Receipt 102595-02-M-1540

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OGE Energy Corp. PO Box 321

Oklahoma City, Oklahoma 73101-0321

405-553-3000 www.oge.com

April 26, 2013

Certified Mail 7011 3500 0003 5311 8361

OGHE

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 1st Quarter 2013

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is providing a summary of exceedences for the Muskogee and Sooner Generating Stations. OG&E has completed measures to achieve reductions in opacity emissions, as described in the consent order. No additional planned measures are being implemented at this time. OG&E will continue to look for opportunities to decrease opacity excess emissions.

The annual and quarterly opacity exceedence percentages for Muskogee and Sooner Generating Stations are recorded in the table below. The annual rolling opacity average is calculated for each station, in accordance with consent order April 1, 2012, through March 31, 2013. Opacity exceedences for the first quarter of 2013, as reported in our Part 60 submittal, are for the period January 1st – March 31st, 2013.

	Total Duration of	Total Time in	Excess Emission	Excess Emission
Unit	Excess Emissions	the Quarter	Duration During	Annual Rolling
	(hours)	(hours)	the Quarter (%)	Average/Station (%)*
Sooner Unit 1	0	2160	0	0.8
Sooner Unit 2	6.1	2160	0.28	
Muskogee Unit 4	0	2160	0	
Muskogee Unit 5	21.5	2160	1.00	0.9
Muskogee Unit 6	34.0	2160	1.57	

^{*}Opacity Excess Emission Annual Rolling per Station (%) for the period April 1, 2012 - March 31, 2013.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham

Superintendent Envirochemical Process

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Mr. Eddie Terrill, Director Oklahoma Department of Environmental Quality April 26, 2013 Page 2 of 2

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor
Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

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Oklahoma City, Oklahoma 73101-0321 405-553-3000

www.oge.com

July 30, 2013

Certified Mail 7011 3500 0003 5311 8460

OG/E

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 2nd Quarter 2013

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is providing a summary of exceedences for the Muskogee and Sooner Generating Stations. OG&E has completed measures to achieve reductions in opacity emissions, as described in the consent order. No additional planned measures are being implemented at this time. OG&E will continue to look for opportunities to decrease opacity excess emissions.

The annual and quarterly opacity exceedence percentages for Muskogee and Sooner Generating Stations are recorded in the table below. The annual rolling opacity average is calculated for each station, in accordance with the consent order for July 1, 2012, through June 30, 2013. Opacity exceedences for the second quarter of 2013, as reported in our Part 60 submittal, are for the period April 1st – June 30th, 2013.

	Total Duration of	Total Time in	Excess Emission	Excess Emission
Unit	Excess Emissions	the Quarter	Duration During	Annual Rolling
	(hours)	(hours)	the Quarter (%)	Average/Station (%)*
Sooner Unit 1	23.6	2184	1.08	η 6
Sooner Unit 2	24.2	2184	1.11	0.6
Muskogee Unit 4	6.9	2184	0.32	
Muskogee Unit 5	7.2	2184	0.33	0.8
Muskogee Unit 6	17.3	2184	0.79	

^{*}Opacity Excess Emission Annual Rolling per Station (%) for the period July 1, 2012 – June 30, 2013.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham

Superintendent Envirochemical Process

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Mr. Eddie Terrill, Director Oklahoma Department of Environmental Quality July 30, 2013 Page 2 of 2

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor
Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

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www.oge.com

October 23, 2013

Certified Mail 7011 0470 0003 5599 3651



Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEO No.: 11-AQN-012

Quarterly Report 3rd Quarter 2013

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is providing a summary of exceedences for the Muskogee and Sooner Generating Stations. OG&E has completed measures to achieve reductions in opacity emissions, as described in the consent order. No additional planned measures are being implemented at this time. OG&E will continue to look for opportunities to decrease opacity excess emissions.

The annual and quarterly opacity exceedence percentages for Muskogee and Sooner Generating Stations are recorded in the table below. The annual rolling opacity average is calculated for each station, in accordance with the consent order for October 1, 2012, through September 30, 2013. Opacity exceedences for the second quarter of 2013, as reported in our Part 60 submittal, are for the period July 1st – September 30th, 2013.

Unit	Total Duration of Excess Emissions (hours)	Total Time in the Quarter (hours)	Excess Emission Duration During the Quarter (%)	Excess Emission Annual Rolling Average/Station (%)*
Sooner Unit 1	0	2208	0	0.5
Sooner Unit 2	0	2208	0	
Muskogee Unit 4	1.2	2208	0.05	
Muskogee Unit 5	5.5	2208	0.25	0.7
Muskogee Unit 6	14.9	2208	0.67	

^{*}Opacity Excess Emission Annual Rolling per Station (%) for the period October 1, 2012 - September 30, 2013.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham

Superintendent Envirochemical Process

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Mr. Eddie Terrill, Director Oklahoma Department of Environmental Quality October 23, 2013 Page 2 of 2

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor
Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

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OGE Energy Corp. PO Box 321

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405-553-3000 www.oge.com

January 30, 2014

Certified Mail 7011 0470 0003 5599 3828

OG/E

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 4th Quarter 2013

Dear Mr. Terrill:

Re:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is providing a summary of exceedences for the Muskogee and Sooner Generating Stations. OG&E has completed measures to achieve reductions in opacity emissions, as described in the consent order. No additional planned measures are being implemented at this time. OG&E will continue to look for opportunities to decrease opacity excess emissions.

The annual and quarterly opacity exceedence percentages for Muskogee and Sooner Generating Stations are recorded in the table below. The annual rolling opacity average is calculated for each station, in accordance with the consent order for the period January 1, 2013, through December 31, 2013. Opacity exceedences for the fourth quarter of 2013, as reported in our Part 60 submittal, are for the period October 1st – December 31st, 2013.

Unit	Total Duration of Excess Emissions (hours)	Total Time in the Quarter (hours)	Excess Emission Duration During the Quarter (%)	Excess Emission Annual Rolling Average/Station (%)*
Sooner Unit 1	23.4	2208	1.06	0.6
Sooner Unit 2	34.5	2208	1.56	
Muskogee Unit 4	26.6	2208	1.20	"
Muskogee Unit 5	7.2	2208	0.33	0.7
Muskogee Unit 6	31.0	2208	1.40	

^{*}Opacity Excess Emission Annual Rolling Average per Station (%) for the period January 1, 2013, through December 31, 2013

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham

Manager Operational Chemistry and Environmental

Mr. Eddie Terrill, Director Oklahoma Department of Environmental Quality January 30, 2014 Page 2 of 2

Enclosures

cc: Mr. Robert D. Singletary, Environmental Attorney Supervisor Oklahoma Department of Environmental Quality, Office of General Counsel

Ms. Kendal Stegmann, Environmental Programs Manager Air Quality Division, Oklahoma Department of Environmental Quality

Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company

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OGE Energy Corp. PO Box 321

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April 30, 2014

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OGE.

Mr. Eddie Terrill, Director Air Quality Division, Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Re: Oklahoma Gas & Electric Company and OG&E Energy Corp.

Muskogee & Sooner Generating Stations Consent Order Case No.: CJ-2011-3361

ODEQ No.: 11-AQN-012

Quarterly Report 1st Quarter 2014

Dear Mr. Terrill:

In accordance with the above referenced Consent Order filed in the District Court of Oklahoma County, Oklahoma, on June 2, 2011, OG&E is providing a summary of exceedences for the Muskogee and Sooner Generating Stations. OG&E has completed measures to achieve reductions in opacity emissions, as described in the consent order. No additional planned measures are being implemented at this time. OG&E will continue to look for opportunities to decrease opacity excess emissions.

The annual and quarterly opacity exceedence percentages for Muskogee and Sooner Generating Stations are recorded in the table below. The annual rolling opacity average is calculated for each station, in accordance with the consent order for the period April 1, 2013, through March 31, 2014. Opacity exceedences for the first quarter of 2014, as reported in our Part 60 submittal, are for the period January 1st – March 31st, 2014.

Unit	Total Duration of Excess Emissions (hours)	Total Time in the Quarter (hours)	Excess Emission Duration During the Quarter (%)	Excess Emission Annual Rolling Average/Station (%)*
Sooner Unit 1	18.3	2160	0.85	0.8
Sooner Unit 2	15.2	2160	0.70	0.0
Muskogee Unit 4	22.3	2160	1.03	
Muskogee Unit 5	39.0	2160	1.81	0.7
Muskogee Unit 6	16.8	2160	0.78	

^{*}Opacity Excess Emission Annual Rolling Average per Station (%) for the period April 1, 2013, through March 31, 2014.

If you have any questions, you may contact me at (405) 553-3221.

Sincerely,

Robert F. Benham

Manager Operational Chemistry and Environmental

6:13-cv-00356-JHP Document 34-13 Filed in ED/OK on 05/21/14 Page 36 of 36

Mr. Eddie Terrill, Director Oklahoma Department of Environmental Quality April 30, 2014 Page 2 of 2

Enclosures

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Oklahoma Department of Environmental Quality, Office of General Counsel

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Mr. Kimber Shoop, Senior Attorney Oklahoma Gas and Electric Company

Ms. Patricia Horn, Vice President, Governance and EH&S Oklahoma Gas and Electric Company